

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA**

EDWINA BILLHIMER, on behalf of herself and others similarly situated,	:	CIVIL ACTION FILE NO. 3:24-cv-00209-
	:	MPB-CSW
Plaintiff,	:	
	:	
v.	:	
	:	
READERSMAGNET, LLC and ELINK SYSTEMS AND CONCEPTS CORP.	:	
	:	
Defendants.	:	

JOINT MOTION TO EXTEND ALL UNEXPIRED DEADLINES BY 120 DAYS

Plaintiff, Edwina Billhimer, and Defendants, ReadersMagnet, LLC and Elink Systems and Concepts Corp., by and through their undersigned counsel, jointly move this Honorable Court to extend by 120 days all deadlines that have not yet passed in the current Case Management Plan and Scheduling Order. In support of this Motion, the parties state as follows:

1. The parties have agreed to participate in a private mediation with the Honorable David Jones (Ret.) on February 11, 2026. The parties believe that a continuance of the remaining case deadlines will conserve judicial resources and allow them to focus their efforts on preparing for and attending this mediation.

2. The parties have continued to cooperate in discovery. Defendant ReadersMagnet, LLC has represented that it will produce supplemental discovery responses, and Plaintiff has already provided her expert report pursuant to Rule 26(a)(2).

3. The requested 120-day extension will enable the parties to complete the mediation before the next substantive deadlines—such as Defendant's expert disclosure deadline, motions to exclude expert testimony, and class certification briefing—become due.

4. Good cause exists under Rule 16(b)(4) for this brief extension. The extension will promote efficiency and the potential for early resolution without impacting the Court's schedule or causing undue delay. The proposed new dates are below:

Event / Deadline	Current Deadline	New Proposed Deadline
Defendant's Expert Disclosure	January 16, 2026	May 16, 2026
Objections to Expert Testimony (Trial)	January 30, 2026	May 30, 2026
Final Witness & Exhibit Lists	February 17, 2026	June 17, 2026
Class Certification Motion	December 23, 2025	April 22, 2026

Wherefore, the parties request that the motion be granted.

Respectfully submitted,

For Plaintiff:
/s/ Anthony I. Paronich
Anthony I. Paronich
PARONICH LAW, P.C.
350 Lincoln Street, Suite 2400
Hingham, MA 02043
(617) 485-0018
anthony@paronichlaw.com

For Defendants:
/s/ Thomas J. Hayes
Thomas J. Hayes
Hayes Law Offices, LLC
309 50th Pl. Western Springs, IL
60558
708-642-7719
thomasjhayes19@gmail.com
ARDC No. 6280179

Dated: November 20, 2025